Universal Waste Fact Sheet: Lamps and Devices

The United States Environmental Protection Agency regulates Universal Waste through the “Universal Waste Rule” (40 CFR part 273). The rule was created to reduce the amount of hazardous waste items that were making it into the municipal solid waste stream. MUSC Occupational Safety and Health Programs (OSHP) oversee the management of universal waste to ensure compliance with all regulations. This fact sheet has been designed to provide employees and contractors with an overview of the requirements for handling, storage, and disposal of universal waste.

UNIVERSAL WASTE QUICK TIPS:

1. DO NOT mix different types of bulbs! Segregate bulbs appropriately.

2. Label each box of bulbs with “Universal Waste – Lamps” labels and the date of accumulation start.

3. Close and tape boxes securely.

4. Treat broken or leaked mercury-containing lamps/devices as hazardous waste.

5. Universal waste cannot be stored for more than 6 months.

UNIVERSAL WASTES COVERED BY SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL REGULATIONS

- Mercury-containing lamps:
  - Fluorescent, compact fluorescent lamps, metal halide lamps
- Mercury-containing devices:
  - Non-broken thermometers, thermostats, manometers

If broken or leaked:
Must be managed as hazardous waste (contact OSHP 843-792-3604)

INCORRECT PACKAGING

CORRECT PACKAGING

UNIVERSAL WASTE FACILITY DETERMINATION

Area managers should assess their routine facility operations and/or their renovation projects to determine the type, quantity, and generation rate of Universal Waste. If Universal Waste is produced, you must follow the procedures below.

SAFETY TIP

When handling universal waste wear proper PPE such as safety glasses and protective gloves.

Any broken or leaked mercury-containing lamp or device must be managed and treated as hazardous waste. Contact OSHP 843-792-3604
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PACKAGING INSTRUCTIONS
Fluorescent Bulbs MUST BE:

1. **Unbroken** – Intact fluorescent bulbs are considered Universal Waste. However, broken bulbs fall into the category of hazardous waste and must be handled as such.

2. **Stored in a container which is structurally sound, adequate to prevent breakage and compatible with the contents** – The best container for used bulbs is the original shipping container. However, any sturdy, corrugated cardboard box of adequate size may be used. Bulb boxes may also be obtained, upon request, from our hazardous waste disposal contractor. Bulbs should be fully contained in the box and not over packed.

3. **Closed and taped securely** – Bulbs in storage boxes, even partially full, should be closed. It is not necessary to tape partially full boxes while in storage although they should closed using the four flap lock method and secured to a stationary object by string or bungee cord. **When a box is full it should be tape securely.** Only one partially full, untaped box is allowed in an area. Boxes of used bulbs offered for disposal should always be taped regardless of the number of bulbs in the box.

4. **Labeled as “Universal Waste – Lamps”** – Preprinted labels with the words **“Universal Waste – Lamps”** should be affixed to each box of used bulbs. This includes partially full boxes. The words **“Universal Waste – Lamps”** may be written legibly on the box in place of a sticker.

   [Image of label with fields for date, area or zone, and bulb count]

5. **Dated** – When the first bulb is accumulated in a container the date should be placed on that container. It is preferable to place the date on the preprinted label, however the date may be written on the box under the words “Universal Waste – Lamps.” **No boxes, even partially full, should remain in storage over six months.**

6. **Disposed of in a proper manner** – Boxes of bulbs that are labeled, dated, and properly packaged **in undamaged, shippable** boxes should be delivered to the CRI loading dock on Tuesday, Wednesday, and Thursday mornings. Bulbs may be delivered to this area on Tuesday morning if the load is small (less than five boxes). **Bulbs should not be transported to this area at any other time.**

7. **Segregated by type** – **DO NOT MIX BULBS!** With the exception of circle/u-shaped bulbs, different type bulbs should not be mixed in the same box. Compact fluorescent bulbs, circle/u-shaped, HID, 4 foot and 8 foot tubes are all different line items on our contract and have different pricing. Although it is usually easy to tell which boxes contain 4 foot or 8 foot tubes, the other type bulbs are often packed in similar boxes. In addition to the labeling discussed above in sections 4 & 5, please label any boxes of CFBs, HID, or circle/u-shaped bulbs as such. This alleviates the need to open each box to determine the type of bulb.

This guide is not all inclusive of Universal Waste policy, but provides main points for safe handling, storage, and disposal.